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Hon. Edwin M. Kosik
U.S. District Court Judge
United States District Court
Middle District of Pennsylvania
William J. Nealon Federal Building
& Federal Courthouse
235 N. Washington Avenue
Scranton, PA 18501

Re: U.S. v. Sergey Korznikov, et. al.
Criminal No. 3:08-cr-00228-EMK

Dear Judge Kosik:

At the conclusion of the Suppression Hearing on July 10, 2009, the Court granted the parties a week to submit a letter supplementing the record, or providing additional arguments. I write to request that the Court extend that deadline until July 24, 2009. Specifically, as the Court may recall, there were several documents that Agent Reinhold did not have access to in his testimony-his original notes of the alleged statement attributed to Mr. Korznikov; his Word document that may contain the alleged statement, and photographs that may have been taken during the search of the car Mr. Korznikov was driving at the time of the seizure of the flash drives.

We have requested that the government seek to determine if those items exist and to provide same to us. I have been informed by Ms. Rourke by e-mail on July 13, 2009 that the government is making an effort to determine the existence of same. While I am hopeful we may have an answer prior to this Friday, I would request that we be granted additional time to receive an answer and a copy of same if they exist.

Respectfully yours,

A handwritten signature in blue ink, appearing to be "RS" or a stylized "Simels", is written above the printed name.

Robert M. Simels